



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

Mr. Durant Graves
Naval Support Activity, Washington
1411 Parsons Avenue SE, Suite 303
Washington Navy Yard, DC 20374-5003

JUL 24 2015

Re: Docket Number 03-2015-006-NN
Notice of Noncompliance
Washington Navy Yard Public Water System
PWS ID No DC0000003

Dear Mr. Durant Graves:

This Notice of Noncompliance and Request for Information is being issued pursuant to Section 1414(a) and Section 1445(a) of the Safe Drinking Water Act (SDWA), 42 U.S.C. §§ 300g-3(a) and § 300j-4(a). According to our records, the Washington Navy Yard public water system (WNY PWS), owned and operated by the United States Navy, has violated certain provisions of the SDWA, 42 U.S.C. §§ 300f-300j-26, and the National Primary Drinking Water Regulations (NPDWR) found at 40 CFR Part 141.

Notice of Noncompliance

The WNY PWS is required to report all total coliform and distribution system disinfectant residuals in accordance with the NPDWRs at 40 CFR §141.31 and 40 CFR §141.75, respectively.

WNY PWS collected total coliform samples on April 1, 2015. Those samples were not included in the report due May 10, 2015 pursuant to CFR §141.31. EPA received the sample results on May 26, 2015, therefore, WNY PWS violated 40 CFR §141.31.

On April 1, 2015, WNY PWS measured six samples for chlorine residuals higher than 4.0 mg/L which WNY PWS believed could have been caused by failure to adhere to the approved analytical method. In an April 2, 2015, electronic message, EPA recommended WNY PWS to resample total coliform and chlorine residuals and to submit a written clarification on what may have caused these high chlorine readings. WNY resampled for total coliform and chlorine residual on April 3, 2015. On April 6, 2015 EPA directed WNY PWS to submit results and written clarification of how April 1, 2015, samples were collected improperly in the monthly report due May 10, 2015. The chlorine concentration results from April 1, 2015 were not included in the monthly report for April, therefore, WNY PWS violated 40 CFR §141.75(b)(2)(iii).

To reduce the risk of incurring similar violations in the future, EPA strongly encourages the WNY PWS to either request clarification when preparing monthly reports or include all monitoring results in monthly reports, including any monitoring that may not be used for compliance, and any accompanying explanations.

Public notification is required for these violations. Failure to comply with 40 CFR §141.31 requires a Tier 3 level public notice and must be completed within 365 days of the initial violations. Please note that the violations must be listed in the Consumer Confidence Report that covers the 2015 calendar year.

If you have any questions regarding the above, please contact Lisa Donahue at 215-814-2062 or donahue.lisa@epa.gov.

Sincerely,



Karen D. Johnson, Chief
Ground Water and Enforcement Branch

Cc: Tawana Spencer, NAVFAC (electronic copy)